

### **REMARKS**

This Application has been carefully reviewed in light of the Office Action mailed July 20, 2005. Claims 1-28 were pending in the Application. In the Office Action, Claims 1-28 were rejected. Claims 1-28 remain pending in the Application. Applicants respectfully request reconsideration and favorable action in this case.

In the Office Action, the following actions were taken or matters were raised:

### **SECTION 102 REJECTIONS**

Claims 1, 3, 4, 6-10, 12, 15-19 and 22-28 were rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,915,519 issued to Williamson et al. (hereinafter "*Williamson*"). Applicant respectfully traverses this rejection.

Applicant respectfully submits that Claims 1, 3, 4, 6-10, 12, 15-19 and 22-28 of the present Application are patentable over *Williamson*. However, Applicant has elected not to address the patentability of Claims 1, 3, 4, 6-10, 12, 15-19 and 22-28 over *Williamson* and instead submits that *Williamson* does not qualify as prior art under Section 102(e) and, therefore, no prima facie rejection has been made. By making this choice, Applicant does not admit the accuracy of the Examiner's remarks or reasoning or acquiescing in any way to the reasoning underlying the rejection.

Applicant conceived and reduced to practice the invention which is the subject of the present Application prior to July 12, 2001, the purported effective date of *Williamson*. In support thereof, Applicant submits the accompanying Declaration under 37 C.F.R. §1.131, the exhibit of which evidences the conception and reduction to practice of the invention prior to the purported effective date of *Williamson*. Accordingly, Applicant respectfully requests that the rejection of Claims 1, 3, 4, 6-10, 12, 15-19 and 22-28 be withdrawn.

### **SECTION 103 REJECTIONS**

Claims 2, 11, 13 and 21 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Williamson*. Claims 5, 14 and 20 were rejected under 35 U.S.C. § 103(a) as being unpatentable over *Williamson* in view of Allaire Corporation, JRun Tag Library Reference (hereinafter "*Allaire*"). Applicant respectfully traverses these rejections.

As discussed above, Applicant respectfully submits that *Williamson* does not qualify as prior art under 35 U.S.C. § 102(e). At least because *Williamson* does not qualify as prior art against independent Claims 1, 8 and 18, *Williamson* also does not qualify as prior art against Claims 2, 5, 11, 13, 14, 20 and 21 that depend respectively therefrom. Accordingly, Applicant respectfully requests that the rejection of Claims 2, 5, 11, 13, 14, 20 and 21 be withdrawn.

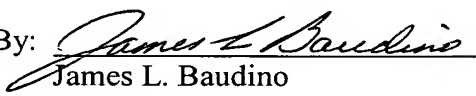
Further, *Allaire* does not appear to remedy the limitations of *Williamson* apparently relied upon by the Examiner to reject Claims 5, 14 and 20. Therefore, for at least this reason also, Applicant respectfully requests that the rejection of Claims 5, 14 and 20 be withdrawn.

**CONCLUSION**

Applicant has made an earnest attempt to place this case in condition for immediate allowance. For the foregoing reasons and for other reasons clearly apparent, Applicant respectfully requests reconsideration and full allowance of all pending claims.

No fee is believed due with this Response. If, however, Applicant has overlooked the need for any fee due with this Response, the Commissioner is hereby authorized to charge any fees or credit any overpayment associated with this Response to Deposit Account No. 08-2025 of Hewlett-Packard Company.

Respectfully submitted,

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